

Williams College Foundation (UK) Limited Privacy Policy

The Williams College Foundation (UK) Limited (“Foundation,” “we,” “us,” and “our”) recognizes that alumni of Williams College and others (“you” and “your”) have a right to know how we collect, store, and use the information about them that can be identified (your “personal data”). This Privacy Policy describes the types of personal data we collect, how we may use and disclose such personal data, and your ability to control certain uses of it.

Who to Contact

If you have questions or requests relating to how we use your personal data, please contact us at:

Sarah Collin, Administrator
Williams College Foundation (UK) Limited
99 Durlston Road, London E5 8RP, United Kingdom
Tel. 020-3380-8435
charityservicesuk@yahoo.com

Personal Data We Collect and Use

The Foundation may collect and use the following personal data: your name, including title; contact information, telephone number, email address and postal address; information to enable use to check and verify your identity, for example your date of birth; information regarding your education at Williams College (the “College”); your contact history; information required to make a gift using our website using our online gift form, including billing telephone number, address, and credit card information; information regarding gifts you have previously made to the Foundation; and information regarding your use of our website (please see “Use if Cookies” and Similar Technologies below).

The Foundation partners with Williams College, which collects additional information on constituents. Please view the [Williams College Privacy Policy](#) for more information.

How Your Personal Data is Collected

Most frequently, we receive your information when you complete Gift Aid forms and Gift Allocation & Notification forms and submit them to us. We also may receive information that you provided directly to the College; for example, you may give the College information by filling in forms on the College’s website (including when you make a gift), or by corresponding with the College by telephone, email, or otherwise.

If you are a student or studied at the College, some of your personal data is transferred from your student record to the College’s alumni database. Some of that personal data may then be securely shared with the Foundation. Please view the [Williams College Privacy Policy](#) for more information.

September 2020

We may also collect personal data from you at events or if you communicate directly with the Foundation.

How We Use Your Data

Your data is used by us for a number of interdependent purposes in support of the mission of the Foundation, as explained below.

Communications to you may be sent by postal mail, telephone, or electronic means (principally by email), depending on the contact details we hold, any consent that you may have provided, and the preferences expressed by you about the types of communications you wish to receive. These communications will provide you with information about College programs and initiatives and work being undertaken in support of the mission of the Foundation.

If you make a gift, we will use the personal data necessary to complete the transaction and to keep a record of the transaction to the extent we are legally required to do so. Please note that the Foundation does not store credit card numbers and expiration dates, except to administer payments through a vendor-provided PCI-compliant solution.

We may use automated or manual analyses to link data together to help us identify your potential for supporting the Foundation. We do these analyses to provide you with an improved experience and to avoid approaching you with opportunities which are not of interest. All of this enables us to raise funds more cost-effectively and to be more responsible in our use of the Foundation's funds, in support of the mission of our organization.

If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us using the details at the top of this Privacy Policy.

How We Share Your Data

We do not sell or otherwise disclose personal data about alumni, donors, and website visitors, except as described here. We do not share your personal data with unaffiliated third parties for their own marketing purposes without your express consent.

We may share personal data we collect from and about you with Williams College. Within the terms of a Data Sharing Agreement, appropriate data is shared by and between the Foundation and the College. The College will make its own determination as to how they process your personal data and for what purposes. For more information on the data maintained by the College, please see the [Williams College Privacy Policy](#).

We may also share the information with service providers we have retained to perform services on our behalf, such as to help run programs and provide customer service. These service providers may have access to personal data if it is needed to perform their functions for the

Foundation, but they are not authorized by the Foundation to use or disclose the information except under our instructions, as necessary to perform services on our behalf or to comply with legal requirements.

In addition, we may disclose information where we think it's necessary to investigate or prevent an actual or suspected crime or injury to ourselves or others, if required by law, or in response to a request from law enforcement authorities or other government officials.

We only allow our service providers to handle your personal data if we are satisfied that they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers relating to ensure they can only use your personal data to provide services to us and to you.

Rights for European Union Residents Under the General Data Protection Regulation (GDPR)

As of May 25, 2018, residents of the European Union member countries have the following rights under the GDPR:

- To ask us for access to, or the correction or erasure of your personal data;
- To ask us to restrict processing of your personal data, for example, if you contest the accuracy of the data;
- Object to our use of your personal data for direct marketing; and
- To ask for the transfer of your personal data electronically to a third party (the right of data portability).

Please note that the rights set out above do not apply in all circumstances or without exceptions. For example, when you request that personal data is erased, we may continue to maintain a core set of personal data (name, limited contact information, and some financial records) to ensure we do not contact you inadvertently in future and for statutory purposes (for example, to comply with anti-fraud and accounting requirements).

Please contact Sarah Collin at charityservicesuk@yahoo.com if you would like to exercise any of the rights above.

If you make a request and are not satisfied with our response, or believe that we are illegally processing your personal data, you have the right to complain to the Information Commissioner's Office (ICO) – see <https://ico.org.uk/>.

Legal Basis for Processing Your Data Under GDPR

We collect and process your personal data in accordance with applicable law, including the GDPR when it applies. We rely on separate and overlapping bases to process your personal data lawfully in accordance with the GDPR for the purposes set out above, including:

- to process a transaction that you have requested or carry out our responsibilities under a contract;
- where the Foundation needs to use your personal data for legitimate purposes relevant to us being able to manage our organization, update personal data records, undertake research on donors in order to efficiently apply our fundraising resources, and ensure we are following our internal procedures. We will always seek to pursue these legitimate interests in a way that does not unduly infringe on your other legal rights and freedoms and, in particular, your right of privacy;
- where you have freely provided your specific, informed, and unambiguous consent for particular purposes;
- where we need to process your personal data to comply with a legal obligation; and
- where we need to protect your vital interests or those of someone else (such as in a medical emergency).

Personal Data Retention

We retain your personal data for as long as necessary in relation to the purposes for which it was collected or is being used as described in this Privacy Policy. The criteria we use for retaining data is based on applicable legal obligations and regulatory guidelines.

Subject to the above, if you are an alum of the College, we will retain your data in support of your lifelong relationship with the Foundation, until you request us to do otherwise.

How We Protect Your Personal Data

The security of personal data is important to us. Williams Foundation maintains administrative, technical, and physical safeguards to protect against unauthorized use, disclosure, alteration, or destruction of the personal data we collect on this website and via other online properties. While we make every effort to help ensure the integrity and security of our network and systems, we cannot guarantee our security measures.

Where Your Personal Data is Held

EU residents should be aware that we may transfer your personal data to the United States, whose laws are currently not considered to meet the same legal standards of protection for personal data which apply in the European Union. However, in order to safeguard your personal data, we only conduct such a transfer under a contract or another appropriate mechanism which is authorized under applicable data protection law. This is to make sure that your personal data is safeguarded in accordance with the same legal standards that apply in the European Union.

Updates to this Privacy Policy

Although most changes are likely to be minor, the Foundation may change its Privacy Policy from time to time, and may do so at the Foundation's sole discretion. The Foundation encourages visitors to check this page frequently for any changes to its Privacy Policy.